REMARKS

1. Rejections under § 103

Claims 1 to 19 have been rejected as unpatentable over an urged combination of U.S. patent no. 5,182,641 to Diner et al. with U.S. patent no. 5,729,471 to Jain et al.

Claim 1 as here amended recites a method for dynamic sensor placement comprising positioning at least one sensory device in a scene of a 3D site model supported in a computer, and rendering in said computer an image of at least part of said scene of the 3D site model in which at least part of a coverage area of the sensory device within the scene of the 3D site model is displayed, and part of the scene of the 3D site model outside said coverage area is displayed. The coverage area is derived in accordance with sensor parameters associated with the sensory device. The rendering of the image is derived for a view point in the 3D site model that is different from the positioning of said sensory device. The rendering step renders the coverage area covered by the sensor in accordance with the sensor parameters such that objects in the 3D site model have a texture that differentiates the coverage area from the part of the scene that is not in the coverage area.

As has been set out in the specification, this method is very advantageous, because it allows the user to see areas to which the coverage of a sensory device, such as a surveillance camera, does not extend as texture in the model of the site, allowing the user to adjust the position of the sensory device in the real world to improve that coverage. None of the cited references shows a rendered image in which the coverage area of a sensor device is shown by a texture in a 3D model, which allows for enhanced visualization of a user configuring sensors for surveillance.

Jain et al. shows simply a 3D rendered image of a site in which a number of video cameras are distributed. The views from four of the cameras are placed at the top of a monitor screen, in a view such as is shown in Figs. 18 to 21. Below the actual camera video feeds, a view of the site is rendered, ostensible to help orient the user. However, although the view of the site shows the camera positions, there is no suggestion in Jain of a definition of coverage areas of the cameras, and there is no suggestion of applying a texture to the surface in the model to indicate the camera coverage areas as required by claim 1, and, consequently, with the Jain system it is not possible to clearly assess the coverage that the cameras have in the site.

The patent of Diner et al. shows a system for controlling a number of TV cameras in a production setting. In Diner, a schematic view of a group of movable cameras is provided, as best seen in Fig. 2, and a "cone of view" of one of the cameras 13 is shown in the plan view of Fig. 2.

This cone of view in Diner is not a texture in a rendered view. Rather the cone of view in Diner is displayed as a rendering of a three-dimensional conical space or volume, not as a texture on surfaces viewed. That a conical volume is displayed is clear from the specification of Diner at col. 10, lines 9 to 15, which states that the conical volume illustrated includes a shading in its unfocused region 32. The unfocused part of the field of view of a camera is not a surface, however. It is instead a portion of a conical volume projecting from the camera, which is apparently displayed schematically in the Diner display of Fig. 2. This view of a shaded three dimensional volume does not provide the visualization advantages of the claimed method where the coverage area is displayed as a texture in the model of the site.

The claimed method has an advantage in that it allows for visualization of coverage of the site as texture in the 3D model. The systems of the Diner or Jain patents, in contrast, do not

provide for such a texture in a 3D model scene. The cited references of Jain and Diner therefore, either alone or in argued combination, do not suggest a method in which texture is applied to a coverage area of a sensor in the scene of a 3D model, with the advantages for visualizing a surveillance site for determining the location of sensors.

Withdrawal of the rejection based on these references is therefore respectfully requested.

The other independent claims, claims 7, 13, 17 and 20, all have been amended to recite rendering an image of a model of a surveillance site in which the coverage area of one or more sensors can be seen as texture in the model. For reasons similar to those expressed above with regard to claim 1, these claims also distinguish over the cited prior art, and allowance thereof is also respectfully requested.

All other pending claims, including newly added claim 27, depend directly or indirectly from independent claims 1, 7, 13, 17 or 20, and therefore distinguish therewith over the prior art.

All pending claims having been shown to distinguish over the prior art in structure, function and result, formal allowance is respectfully requested.

Should any questions arise, the Examiner is invited to telephone attorney for applicant at 212-490-3285.

Respectfully submitted,

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